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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ALASKA**

ELIZABETH BAKALAR,

Plaintiff,

Case No. 3:19-cv-00025 JWS

vs.

MICHAEL J. DUNLEAVY, in his  
individual and official capacities;  
TUCKERMAN BABCOCK; and the STATE  
OF ALASKA,

Defendants.

**PLAINTIFF'S SECOND MOTION FOR ADDITIONAL TIME TO FILE OPPOSITION  
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

SECOND MOTION FOR ADDITIONAL TIME  
*Bakalar v. Dunleavy, et al.* Case No. 3:19-cv-00025 JWS  
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Plaintiff moves for an additional three weeks to file her Opposition to Defendants' Motion for Summary Judgment. Plaintiff's lead counsel, Mark Choate, had been in trial in *Jiang vs. University of Hawaii*, No. 1CC151002378, set in the 1<sup>st</sup> Circuit Court in Honolulu before the Honorable Jeffrey Crabtree. The trial began on May 10, 2021, and only just concluded testimony on June 24, 2021. Originally scheduled for two weeks, the unanticipated seven weeks that were required to complete the taking of evidence has disrupted other work. With the evidence in that case completed, Plaintiff's counsel filed last week an opening brief in the Alaska Supreme Court and is now working with co-counsel on the briefing in this matter.

Because of the important constitutional elements of this case, it's counsel's opinion that the combined opposition and cross-motion are the most effective means of setting the factual and legal issues before the court. As the court has moved the dispositive motion deadline to July 30, 2021, it is requested that the Opposition to the State's Motion for Summary Judgment be due on the same date.

Dated: July 9, 2021.

CHOATE LAW FIRM LLC  
Attorneys for Plaintiff

*/s/ Mark Choate*

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By: Mark Choate, 8011070

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## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing  
was sent to counsel of record on July 9, 2021  
via USDC CM/ECF:

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## Counsel for Defendants

*/s/ Mark Choate*

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Choate Law Firm LLC

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